

**REED SMITH LLP**

*Formed in the State of Delaware*

Diane A. Bettino, Esq.

Laura K. Conroy, Esq.

Princeton Forrestal Village

136 Main Street, Suite 250

Princeton, New Jersey 08540

Tel (609) 514-5956

Fax (609) 951-0824

Attorneys for Defendant Wells Fargo Bank, N.A.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

LORETTA THOMAS and  
FRANKLIN THOMAS,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,  
ZUCKER, GOLDBERG &  
ACKERMAN, LLC,

Defendants.

Civil Action No.  
2:15-cv-00871-CCC-MF

*Motion Returnable:  
September 8, 2015*

**NOTICE OF DEFENDANT'S  
MOTION TO DISMISS  
PLAINTIFF'S AMENDED  
COMPLAINT WITH PREJUDICE**

**TO:** Loretta Thomas  
Franklin Thomas  
279 Seaview Avenue  
Jersey City, New Jersey 07092  
*Pro Se Plaintiffs*

**PLEASE TAKE NOTICE THAT** on August , 2015, at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for Defendant Wells Fargo Bank,

N.A. shall move before the Honorable Claire C. Cecchi, U.S.D.J., at the Federal District Court for the District of New Jersey located at the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101 on a Motion to Dismiss Plaintiffs' Amended Complaint with Prejudice.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Defendant shall rely on the attached Memorandum of Law and Certification of Laura K. Conroy, Esq., with exhibits submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order granting Defendant's Motion to Dismiss Plaintiffs' Amended Complaint is enclosed herewith.

**REED SMITH LLP**  
*Attorneys for Defendant*

By: s/ Laura K. Conroy.  
Laura K. Conroy

Dated: July 27, 2015